

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA, :
 :
 : 15 Cr. 565 (VEC)
 - v. - :
 :
 KEVIN JOHNSON, :
 :
 Defendant. :
 :
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**NOTICE OF MOTION BY
PRO PUBLICA INC. FOR LEAVE TO INTERVENE, LIFT THE
PROTECTIVE ORDER AND UNSEAL JUDICIAL RECORDS**

PLEASE TAKE NOTICE that upon the accompanying memorandum of law, dated September 25, 2017; and declaration of Hannah Bloch-Wehba, sworn to September 25, 2017, with its accompanying exhibits, proposed intervenor Pro Publica, Inc. will move this Court, before the Honorable Valerie Caproni, at the United States Courthouse, 500 Pearl Street, New York, New York, for an Order permitting it to intervene, lifting the protective order, and unsealing judicial records in this case, and for such other and further relief as the Court deems just and proper.

Dated: September 25, 2017
New York, New York

Respectfully submitted,
/s/ David A. Schulz
David A. Schulz
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